

February 23, 1989

Wilder Construction Co., Inc.
2006 N. State St.
Bellingham, WA 98225

Gentlemen:

Underground Tanks
Specification No. 2928

We have reviewed the modified procedure dated February 16 and 20, 1989 for handling the PCB and tanks located at the Georgetown site, and find them acceptable.

Yours truly,
Original Signed by
CHARLES J. WEEMS, P.E.
DIRECTOR, CONSTRUCTION ENGINEERING

Charles J. Weems, P.E.
Director, Construction Engineering

WES:rtb

cc: 822/Schwartz
Summers/Wang
Miller/Chu
Axelrod w/attach
File

SCL 04118

CTY0049125

SEA289604

Mr. Charles J. Weems, P.E.
February 20, 1989
Page Two

The time frame for all work on this job seems to be slipping due to approval and design problems. We will be asking for more time to complete the work as soon as we know how much we have been impacted.

If you have questions, please feel free to contact me at (206) 733-2060.

Sincerely,

WILDER CONSTRUCTION CO., INC.

Clay Romain
Clay Romain
Project Manager

CR:bm

Enclosures

SCL 04119

CTY0049126

SEA289605

WILDER

WILDER CONSTRUCTION CO., INC.

Spec 2928

February 20, 1989

5+
39 FEB 22 11:21
CONST. Eng. ✓

Mr. Charles J. Weems, P.E.
Director, Construction Engineering
CITY LIGHT DEPARTMENT
1015 Third Avenue
Seattle, WA 98104

RE: Underground Tanks - 1988 Program
Specification No. 2928

Dear Mr. Weems:

Enclosed is a modified procedure for handling the PCB and tanks located at the Georgetown site submitted by G.L. Construction. Certain portions of the work are referenced in his proposal for work to be accomplished by Wilder Construction. After the tank has been emptied, Wilder Construction will remove any attached piping and plug the holes. We will make the tanks inert and provide certification as required. We will get the permit from the Fire Department as required. Excavation will then proceed to uncover the tanks. Wilder Construction will provide the crane to lift the tank out of the hole. This will be accomplished with appropriate straps, spreader bars and other equipment needed to carefully hoist the tank. As soon as the tank is lifted slightly, plastic sheeting will be slipped under the tank and wrapped completely to contain any leakage. The tank will then be lifted and swung onto the waiting truck, which will have another diaper to further assure that there will be no leakage during transport. Any contaminated gloves, strapping or other disposable material which came in contact with the possible contaminant will be shipped for disposal with the tanks. Please review these procedures as soon as possible so we may make any necessary corrections and get moving on this portion of the job.

Another matter needs to be addressed. We are currently experiencing unanticipated delays related to piping for the tanks at Seattle City Light Service Center. Some problems with design have delayed ordering the materials for this part of the project. We are also waiting for approval of a change order for installation of plumbing on the interior of the building. We are waiting for the City to take some samples at the Georgetown site. It appears that the concentrations of oil in the soil may exceed what Cedar Hills Landfill will accept. I would appreciate any information you may have on this problem.

enc. ✓
cc: DS-EUS
Rockey

RECEIVED

FEB 22 1989

WILDER CONSTRUCTION CO., INC. CONSTR. ENG.
UNIT 822

2006 N. STATE STREET
BELLINGHAM, WA 98225-4292
(206) 733-2060
FAX (206) 733-7115

11301 LANG STREET
ANCHORAGE, AK 99515-3006
(907) 344-2593
FAX (907) 344-1562

SCL 04120

CTY0049127

SEA289606

CTY0049128

MORRIS ENVIRONMENTAL SERVICES

31629 37th Avenue SW
Federal Way, WA 98023

(206) 874-2207

Mr. Kamol Lekhakul
G. L. Construction
8040 SE 36th Street
Mercer Island, WA 98040

Specialized Trucking Co
Tacoma WAD 070402854

G.L. Constr. (Kamul)
WAD 980-833-719

Dear Mr. Lekhakul:

(Gresham: ORDO5973437)

The following are procedures recommended for
PCB-contaminated fluids and tanks, and prepara-
items for shipment.

SCL 04121

Preparation

Prior to any of these operations, a Generator Waste Product
Questionnaire (profile sheet) will be prepared by Seattle City
Light and submitted to the treatment and disposal facility
(Envirosafe Services of Idaho, Inc.).

No - GL will prepare and
submit. SCL may sign as generator,
only.

Prior to the removal operation, Wilder Construction will ensure
that Seattle City Light has notified the Washington Department
of Ecology. Wilder Construction will also provide prior
notification to the Seattle Fire Department and comply with the
requirements of City Light Specification No. 2928, Section
02050, Subparagraph 3.04.

No
Spec calls for
contractor
to contact
DOE. SCL is
not obligated to
do this in spec.

Good.

Tank Emptying

The oil will be removed and transported by Fuel Processors,
Portland, OR, EPA ID # 980 986 012. * What oil?? SCL does not give

anything over 1ppm to Fuel Proc. or equiv.

All access hole covers at the top of the tanks will be removed.
A sheet of plastic will be placed around each hole to catch any
dripping fluid.

Using a vacuum truck, a hose will be extended into the tank
down to the fluid surface. As much free fluid as possible will
be removed from each tank. When it is apparent that no further
material can be pumped, the hose will be carefully removed from
the tank, taking precautions to prevent spills of any residual
fluid. Rubber gloves will be worn for handling of contaminated
portions of the hose.

Use nitrile (solvent) for less reaction w/ PCB.

SCL 04122

MORRIS ENVIRONMENTAL SERVICES

31629 37th Avenue SW
Federal Way, WA 98023

(206) 874-2207

=====

February 16, 1989

Mr. Kamol Lekhakul
G. L. Construction
8040 SE 36th Street
Mercer Island, WA 98040

Dear Mr. Lekhakul:

The following are procedures recommended for the removal of PCB-contaminated fluids and tanks, and preparation of these items for shipment.

Preparation

Prior to any of these operations, a Generator Waste Product Questionnaire (profile sheet) will be prepared by Seattle City Light and submitted to the treatment and disposal facility (Envirosafe Services of Idaho, Inc.).

No - GL will prepare and submit. SCL may sign as generator only.

Prior to the removal operation, Wilder Construction will ensure that Seattle City Light has notified the Washington Department of Ecology. Wilder Construction will also provide prior notification to the Seattle Fire Department and comply with the requirements of City Light Specification No. 2928, Section 02050, Subparagraph 3.04.

Spec calls for Contractor to contact DOE. SCL is not obligated to do this in spec.

Good.

Tank Emptying

The oil will be removed and transported by Fuel Processors, Portland, OR, EPA ID # 980 986 012.

** What oil?? SCL does not give anything over 1ppm to Fuel Proc. or equiv.*

All access hole covers at the top of the tanks will be removed. A sheet of plastic will be placed around each hole to catch any dripping fluid.

Using a vacuum truck, a hose will be extended into the tank down to the fluid surface. As much free fluid as possible will be removed from each tank. When it is apparent that no further material can be pumped, the hose will be carefully removed from the tank, taking precautions to prevent spills of any residual fluid. Rubber gloves will be worn for handling of contaminated portions of the hose.

Use nitrile (solvent) for less reaction w/ PCB.

SCL 04122

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February 16, 1989

The hose will be carefully handled to prevent spills or contamination as it is moved between different tank ports.

When each tank has been emptied of free and/or pumpable fluid, any parts or plastic sheet will be removed from the tank. Any spill that contacted the tank exterior will be wiped up with rags, and the contaminated area will be cleaned with a solvent-soaked rag. Tools that become contaminated during the spill cleanup operation will be similarly decontaminated and cleaning materials disposed of with other PCB-contaminated wastes.

~~Will be removed~~
~~Solvent~~
~~to ESI?~~
Water better?
Detergent?

Any spill onto soil will be removed for disposal with other solid wastes. ~~No!~~ If PCB sludge drops on soil, soil goes into drum w/ PCB waste!!

Floor Dri (TM) or an equivalent absorbent will be poured into the tank openings to capture any residual free fluids. The tank covers should then be replaced.

Pump them dry w/ hand pump. No liquids to ESI.

The vacuum truck will be properly secured, and appropriate placards placed prior to shipment. Fuel Processors will not depart from the project site without a properly prepared manifest signed by Seattle City Light.

SCL will NOT manifest oil over 1ppm to Fuel Processors.

Fuel Processors will dispose of the contaminated oil by combustion in a permitted energy recovery facility. ~~then~~

What happened to drums w/ absorbent? PCB sludge going to ESI??

Tank Removal

Wilder Construction will remove the tank, and comply with the requirements of City Light Specification No. 2928, Section 02050, Subparagraph 3.04. The tank should be lifted in such a manner that it is not mishandled or damaged, endangering the structural integrity of the tank.

When either tank is removed, the soil in the resultant cavity should be inspected to determine if a leak from the tank, or from spillage, had previously occurred. If necessary, sampling and analysis will be performed per City Light Specification No. 2928, Section 02050, Subparagraph 3.05.

The tank will then be labeled. ~~Part 2~~

Solid Waste

Any PCB-contaminated rags, clothing, used hose, etc., will be placed in a proper drum and included in the shipment of the tanks or contaminated oil.

SCL 04123

CTY0049130

SEA289609

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February 16, 1989

Lifting/Loading

The tanks will be placed on plastic sheeting which can be drawn up to create a "diaper" to contain any leak that might occur during transportation. The truck to be utilized will have sideboards.

The tanks will be secured prior to departure from the scene. A Uniform Hazardous Waste Manifest will be prepared and signed by the generator (Seattle City Light). Proper placards will be placed on the vehicle(s).

The tanks, with sludge, will be transported for final processing at the Grandview, ID, facilities of Envirosafe Services of Idaho, Inc.

At their facility, Envirosafe Services will cut apart the tanks, remove the sludge, ensure that it is properly solidified, and dispose of it in their permitted landfill. The tanks will be also landfilled.

Safety and Health Precautions

Certain PCB mixtures have been identified as suspected human carcinogens. At the low concentrations present in the waste oils at City Light, the risk to workers is very slight. (nitrile gloves preferred) Nonetheless, exposure should be minimized. Heavy rubber gloves should be utilized when handling contaminated items (such as hoses); the gloves should not be used for any other purpose, including handling of noncontaminated items.

Protective clothing such as Tyvek (TM) suits will protect other clothing from contamination, but is optional to wear. Any clothing that does come in contact with PCB-contaminated oil will be disposed of as noted above.

Need
Shoe
Coverings.

Goggles are recommended if there is a likelihood of splashing oil during pump-out or handling.

As should be done with any chemical handling, hands must be washed prior to eating or smoking when handling PCBs or solvents. Hands should also be washed prior to using rest room facilities.

SCL 04124

CTY0049131

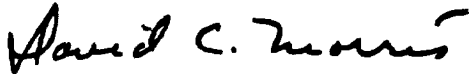
SEA289610

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Mr. Kamol Lekhakul
February 16, 1989

General

No written procedure can anticipate every problem. Workers performing this task should be instructed to use common sense and to ask questions if there are any concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "David C. Morris". The signature is fluid and cursive, with the first name "David" being more prominent.

David C. Morris
Certified Hazardous Materials Manager

SCL 04125

CTY0049132

SEA289611